

INSTRUCTION MANUAL FOR AFFIRMATIVE ACTION COMPLIANCE

The Affirmative Action Compliance package is provided by CHFA to assist general contracting companies in completing their Affirmative Action Compliance, as required by the Minority Hiring Agreement, pursuant to the provisions of the Connecticut Housing Finance Authority Act, Chapter 124 of the Connecticut General Statutes, as amended.

Every effort has been made to anticipate problems and questions that commonly arise when completing these forms. **READ ALL INSTRUCTIONS BEFORE BEGINNING.** Complete each section in its entirety, providing all information requested.

If one of the requested sections is not applicable at this time, please state that and indicate that it will be submitted when it is applicable. For example, if bids have been received but not decided upon, state that the form for recording “why bids were not accepted” will be sent when the decisions are made and add “**TO BE DETERMINED**” to each page where applicable.

GENERAL INSTRUCTIONS:

- First, check your package to ascertain that it is complete. Each package should contain compliance pages 1 – 20. If any pages are missing, please contact this office.
- Type or print in **black ink** all information requested.
- To allow adequate time for review and revisions (if applicable), the Affirmative Action Compliance must be submitted by the General Contractor of a CHFA financed development **at least thirty (30) days prior to the scheduled date of the Initial Loan Closing date.**
- Please mail completed packages (and quarterly reports) to:

Seth St.Jean
Operations Officer I
Connecticut Housing Finance Authority
999 West Street
Rocky Hill, CT 06067-4005

- Questions can be directed to him at:
(860) 571-4251 or at seth.st.jean@chfa.org

COVER PAGE (Page 1):

You may use the sample given as your format or you may create your own style (applicable only to Page 1). If you create your own style, please be sure to include the following:

- Company Name – Provide complete legal name of company. **Do not use acronyms or abbreviations.**
- Address – Provide the company's complete current address. Also include street address if different from mailing address.
- Period covered – Plan should cover the date action is started through completion of the project.
- Signature – Provide clearly printed and/or typed name and title of the person performing equal employment opportunity duties and that of the Chief Executive Officer. Signatures are required in the designated spaces.
- The name of the development, as well as the CHFA project number should also be listed.

POLICY STATEMENT (Page 2):

The company can adopt the statement provided and fill in the applicable information or write its own policy statement. If a company elects to write its own policy, **the first paragraph of the sample provided must be included verbatim.** The policy must include all protected classes and refer to compliance with applicable laws, statutes, and regulations. In addition, the policy must apply to all phases of the employment process. The name of the person responsible for the day-to-day activities should also be included. It should be dated and signed by the Chief Executive Officer.

INTERNAL COMMUNICATION (Page 3):

This section of the Affirmative Action Requirements describes actions the company should take to inform present employees about Company equal employment opportunity policies and affirmative action hiring commitments. You should also describe any other actions that you do or have planned to do.

EXTERNAL COMMUNICATION (a.k.a. OUTREACH or MARKETING) (Page 4):

This section of the Affirmative Action Compliance describes actions the company should take to inform prospective employees and subcontractors, employment resources and the public about the Company's commitment to equal employment opportunity and affirmative action.

ORGANIZATIONAL ANALYSIS (Page 5):

Provide a list of trades or occupations that will be employed in this project.

AFFIRMATIVE ACTION STEPS (Page 6-7):

The General Contractor shall agree to the eighteen specific steps listed in Section VB of the Minority Hiring Agreement (sample Minority Hiring Agreement is available on CHFA website). Please number your statements 1 through 18 so that each numbered item matches its corresponding numbered step from the Minority Hiring Agreement.

AFFIRMATIVE ACTION GOAL (Pages 8-11):

This section should list the projected percentages of the total workforce hours that will be worked by minority male trade workers and female trade workers. These percentages should be reflective of the worker availability statistics for the area where the development will be constructed.

SUBCONTRACTOR OUTREACH/RECRUITMENT (Pages 12-14):

Self-explanatory

CONTRACTORS ESTIMATE INFORMATION (Pages 15-17):

A copy of this form must be submitted for each contract negotiated. When the contract is finalized, all subcontractors submitting estimates should be listed. **All subcontractors hired for work** on the development are required to sign the affirmation on page 17. These affirmations must be submitted to CHFA with the Contractors Estimate Information.

PROJECT REPORTING AND MONITORING PROCEDURES (Pages 18-19):

The contractor must affirm his/her commitment to submit the Utilization Report (Form cc-257) on a quarterly basis. (Note: We have this form available in Excel format.)

CONCLUDING STATEMENT (Page 20):

The signature of the Chief Executive Officer and the EEO/AA Officer are required to evidence their support of the Affirmative Action Compliance.

SAMPLE
AFFIRMATIVE ACTION PLAN
FOR
EQUAL OPPORTUNITY EMPLOYMENT

Company Name _____

Company Address _____

Period Covered _____ through project completion
(Date submitted)

Date

Signature of EEO/Affirmative Action Officer

Printed name and title of EEO/AA Officer

Date

Signature of Company CEO

Printed name of CEO

This Affirmative Action Plan is submitted for:

(Name of Development)

CHFA Project
Number _____

AFFIRMATIVE ACTION/EQUAL OPPORTUNITY EMPLOYMENT (EOE)
POLICY STATEMENT

_____ (hereafter referred to as "The Company")
(Name of Company)

hereby reaffirms its policy of practicing equality of employment opportunities to all regardless of race, creed, color, national origin or ancestry, sex, marital status, age, sexual orientation, genetic information, learning disability, present or past history of mental disability, mental retardation, or physical disability (except as permitted in section 46a-60 of the General Statutes), or other classification(s) protected by state or federal law.

This policy applies to all phases of the employment process such as recruitment, selection, appointment and placement, training, upward mobility, transfers, layoffs and recalls. All compensation, benefits, transfers, education and tuition assistance, social and recreation programs will be administered according to the EOE policy.

The Company complies with local, state and federal laws on the subject of equal employment opportunity as well as provides affirmative efforts to recruit those persons who may have formerly been excluded from the mainstream of the economic system.

Managers and supervisory staff are being advised of their responsibility to ensure the success of the program.

Ultimate responsibility for the Affirmative Action Program rests with the Chief Executive Officer. However, the day-to-day duties will be coordinated by _____,
_____(Title), who has been designated as Affirmative Action Officer.

This Affirmative Action Plan has my full support. In addition, each manager and supervisor as well as all employees are to aid in development and implementation of the program and will be held responsible for compliance to its objectives.

Printed Name of CEO/President

Date

Signature of CEO/President

INTERNAL COMMUNICATION

- A copy of the Affirmative Action/Equal Opportunity Employment (EOE) Policy Statement will be distributed to every employee.
- Managers and supervisors will be made aware of the Affirmative Action Program by orientation sessions.
- The policy statement will be displayed on the company bulletin board.
- The Affirmative Action Program and equal employment policy will be described in the supervisors' handbook, employees' handbook and other company publications.
- Please describe any other actions planned:

EXTERNAL COMMUNICATION

- The following statement will be included in all employment recruiting notices.

“Affirmative Action/Equal Opportunity Employer”

- The union(s), if applicable, with which the workers are affiliated will be advised in writing of the Affirmative Action Program. It will be advised of the hiring goals and of the expectation that the union will cooperate in achievement of the goals.
- Regular recruitment sources, community ethnic groups, women’s organizations, advocate and rehabilitation groups for the handicapped and the aged will be notified in writing of the company’s Affirmative Action/Equal Opportunity Employment policy.
- Major subcontractors, vendors and suppliers will be informed in writing of the Affirmative Action/Equal Opportunity Employment policy.
- Please describe any other actions planned:

ORGANIZATIONAL ANALYSIS

This section should include a listing of all of the trade categories that will be needed to perform the work of this specific project (include those to be employed by your Company and all subcontractors).

AFFIRMATIVE ACTION STEPS

Section V.B. of the Minority Hiring Agreement lists 18 specific affirmative action steps to be taken. In this section discuss how you will accomplish these steps.

Contractor shall:

1. Notify Minority recruitment sources and community organizations, in writing, that Contractor has employment opportunities available and shall maintain records of the organizations' responses.
2. In hiring Minority journeymen, helpers, apprentices, and trainees (where applicable), advertise in Minority newspapers, as well as utilize other available resources.
3. Maintain a file of the names and addresses of Minority workers referred to Contractor, what action was taken with respect to each such referred worker and the reasons therefore. If such worker was not employed by Contractor, Contractor's file shall document this and the reasons therefore.
4. Promptly notify the Authority when (i) any union or unions with which Contractor has a collective bargaining agreement have not referred to Contractor a Minority worker sent by Contractor or (ii) Contractor has other information that the union referral process has impeded Contractor in efforts to meet its goals.
5. Participate in training programs including apprenticeship, trainee, and journeyman programs.
6. Disseminate its affirmative action/equal employment opportunity policy within its own organization by including such policy in any policy manual; by publicizing it in firm publications, e.g., newspaper(s), newsletter(s), and annual report(s); by conducting meetings to explain and discuss the policy; by posting the policy in conspicuous places on the Development site; and by specific review of the policy with employees.
7. Disseminate its affirmative action/equal employment opportunity policy externally by informing and discussing it with all recruitment sources; by advertising in Minority newspapers; and by notifying and discussing it with all subcontractors and suppliers with whom Contractor does or anticipates doing business.
8. Make specific recruitment efforts directed at Minority organizations, schools with Minority students, Minority recruitment organizations, and Minority training organizations within Contractor's recruitment area.
9. Make efforts to encourage present Minority employees to recruit others.
10. Validate all tests and other selection requirements which adversely affect the opportunities of Minorities by showing that such requirements are relevant to performance on the job(s) in question.
11. Use its best efforts to make available after-school, summer, and vacation employment for Minority youth.

12. Use good faith efforts to develop on-the-job training opportunities and participate and assist in the development of off-site Minority training programs.
13. Evaluate all Minority personnel for promotional opportunities and encourage Minority employees to seek such opportunities.
14. Assure that seniority practices, Job Classifications, craft categories, and promotion procedures do not have a discriminatory effect.
15. Assure that all firm facilities and activities are non-segregated.
16. Monitor all personnel activities to assure that its Affirmative Action Plan is being carried out.
17. Undertake a good faith effort, as hiring opportunities occur, to include a specific percentage of minority and female trade workers. Such percentage shall be based on participation goals for the Metropolitan Statistical Area (MSA) in which the Development is located.
18. Require that all subcontractors affirm, in writing, their commitment to affirmative action in employment.

AFFIRMATIVE ACTION GOAL

(Name of Company) _____ will make a good faith effort to include:

_____ % minority workers and

_____ % female trade workers

on construction of (_____ development name _____)

to be located in (Metropolitan Statistical Area).

The Metropolitan Statistical Areas and related minority/female trade workers availability are listed on the following three pages.

CONNECTICUT METROPOLITAN STATISTICAL AREAS

MSA – Bridgeport

Ansonia
Beacon Falls
Bridgeport
Derby
Easton
Fairfield
Milford
Monroe
Oxford
Seymour
Shelton
Stratford
Trumbull

MSA – New Britain

Berlin
New Britain
Plainville
Southington

MSA – New Haven

Bethany
Branford
Cheshire
Clinton
East Haven
Guilford
Hamden
Killingworth
Madison
Meriden
New Haven
North Branford
North Haven
Orange
Wallingford
West Haven
Woodbridge

MSA – Hartford

Andover
Avon
Barkhamsted
Bloomfield
Bolton
Canton
Colchester
Columbia
Coventry
East Granby
East Haddam
East Hartford
East Windsor
Ellington
Enfield
Farmington
Glastonbury
Granby
Hartford
Hebron
Manchester
Marlborough
New Hartford
Newington
Rocky Hill
Simsbury
Somers
South Windsor
Stafford
Suffield
Tolland
Vernon
West Hartford
Wethersfield
Willington
Windsor
Windsor locks

MSA – New London/Norwich

Bozrah
Canterbury
East Lyme
Franklin
Griswold
Groton
Ledyard
Lisbon
Montville
New London
North Stonington
Norwich
Old Lyme
Preston
Salem
Sprague
Stonington
Waterford

MSA – Norwalk

Norwalk
Weston
Westport
Wilton

MSA – Stamford

Darien
Greenwich
New Canaan
Stamford

CONNECTICUT METROPOLITAN STATISTICAL AREAS

MSA – Waterbury

Bethlehem
 Middlebury
 Naugatuck
 Prospect
 Southbury
 Thomaston
 Waterbury
 Watertown
 Wolcott
 Woodbury

MSA - Danbury

Bethel
 Bridgewater
 Brookfield
 Danbury
 New Fairfield
 New Milford
 Newtown
 Redding
 Ridgefield
 Sherman

MSA - Middletown

Cromwell
 Durham
 East Hampton
 Haddam
 Middlefield
 Middletown
 Portland

MSA – Bristol

Bristol
 Burlington
 Plymouth

Balance of State

Ashford
 Brooklyn
 Canaan
 Chaplin
 Chester
 Colebrook
 Cornwall
 Deep River
 Eastford
 Essex
 Goshen
 Hampton
 Hartland
 Harwinton
 Kent
 Killingly
 Lebanon
 Litchfield
 Lyme
 Mansfield
 Morris
 Norfolk
 North Canaan
 Old Saybrook
 Plainfield
 Pomfret
 Putnam
 Roxbury
 Salisbury
 Scotland

Balance of State - continued

Sharon
 Sterling
 Thompson
 Torrington
 Union
 Voluntown
 Warren
 Washington
 Westbrook
 Winchester
 Windham
 Woodstock

PROJECT WORKSITE AFFIRMATIVE ACTION HIRING GOALS
 State Metropolitan Statistical Area (MSA)
 Minority/Female Trade Worker Availability

MSA	% Minority Workers Availability	% Female Workers Availability
Bridgeport	14%	6.9%
Hartford	15%	6.9%
New Britain	11%	6.9%
New Haven	14%	6.9%
New London/Norwich	8%	6.9%
Norwalk	17%	6.9%
Stamford	17%	6.9%
Waterbury	10%	6.9%
Bristol	2%	6.9%
Danbury	4%	6.9%
Middletown	8%	6.9%
Balance of State	2%	6.9%

SUBCONTRACTOR OUTREACH/RECRUITMENT

In this section of the Affirmative Action Plan, the Company should document the “good faith efforts” that it undertakes to include minority and woman owned companies as project subcontractors or suppliers of material. For example, the Company should identify in this section the steps that will be taken to locate and solicit estimates from minority and woman owned companies.

The forms on pages 13 and 14 can be used to list contractor associations, minority organizations, and referral sources contacted.

The form on page 15, “Contractor’s Estimate Information”, should be used to identify all estimates received for each subcontract. This form should be submitted to CHFA when each subcontract is signed. Each subcontractor hired should complete and sign the form titled “Affirmative Action in Employment” on page 17. You should also obtain from the subcontractor, if applicable, a copy of their “Certificate of Eligibility” issued through the “Small Contractors Set-Aside Program” by the State of Connecticut Department of Administrative Services. Each of the aforementioned forms should be submitted with the “Contractor’s Estimate Information”.

**LIST OF MINORITY SUBCONTRACTOR AND MINORITY CONTRACTOR
ASSOCIATIONS CONTACTED IN THE PROCESS OF SELECTING
SUBCONTRACTORS**

	Association's Name and Address	Trade	Date Contacted
1.	_____	_____	_____

2.	_____	_____	_____

3.	_____	_____	_____

4.	_____	_____	_____

5.	_____	_____	_____

6.	_____	_____	_____

LIST OF MINORITY ORGANIZATION AND REFERRAL SOURCES CONTACTED

Minority Media:

	Name	Phone Number	Date Contacted
1.	_____	_____	_____
2.	_____	_____	_____
3.	_____	_____	_____
4.	_____	_____	_____
5.	_____	_____	_____
6.	_____	_____	_____
7.	_____	_____	_____

Organizations and Referral Sources:

	Name	Phone Number	Date Contacted
1.	_____	_____	_____
2.	_____	_____	_____
3.	_____	_____	_____
4.	_____	_____	_____
5.	_____	_____	_____
6.	_____	_____	_____
7.	_____	_____	_____

CONNECTICUT HOUSING FINANCE AUTHORITY
 CONTRACTOR'S ESTIMATE INFORMATION

Project Name _____

Due Date: _____

Subcontractor and Company's Address	Trade	Minority Status Minority/Women	Amount of Estimate Submitted	Accepted or Rejected	Estimated Start Date of work

TOTAL MINORITY CONTRACTS _____

**THE REASON FOR DECLINING MINORITY
SUBCONTRACTOR/CONTRACTOR'S BID**

Name of Subcontractor/Contractor	Reason
1. _____	_____
2. _____	_____
3. _____	_____
4. _____	_____
5. _____	_____
6. _____	_____
7. _____	_____
8. _____	_____
9. _____	_____
10. _____	_____
11. _____	_____
12. _____	_____
13. _____	_____
14. _____	_____

AFFIRMATIVE ACTION IN EMPLOYMENT – SUBCONTRACTOR

(Name of Development)

The Connecticut Housing Finance Authority requires that all contractors and subcontractors engaged in the construction or rehabilitation of housing assisted by the Authority shall take affirmative action to provide equal opportunity for employment without discrimination as to race, creed, national origin, ancestry, or sex. The developer and contractors shall utilize creative and aggressive approaches to provide equal opportunity for employment.

During the performance of any contracts for the construction of the above-captioned development (the "Development") the undersigned contractor (the "Contractor") agrees to comply with CHFA policy as follows:

1. To abide by the provisions of Executive Order 11246 and incorporate the Order in all nonexempt contracts entered into by the Contractor.
2. Not to discriminate against any employee or applicant for employment because of race, creed, color, national origin or ancestry, sex, marital status, age, sexual orientation, genetic information, learning disability, present or past history of mental disability, mental retardation, or physical disability or any other classifications protected by state and federal law in connection with performance of work under this Program, or other classifications protected by state or federal law. The aforesaid provisions shall include, but not be limited to, the following: advertising, recruitment, layoff, termination, rates of pay or other forms of compensation, conditions or privileges of employment, and selection for apprenticeship. The contractor shall hereafter post on the Development site in conspicuous places, available for employees and applicants for employment, notices to be provided by Authority citing the applicable provisions of the Connecticut General Statutes.
3. In hiring minority journeymen, helpers, apprentices, and trainees (where applicable), to advertise in minority newspapers, and to rely on referrals from the Authority, as well as traditional methods utilized by the construction industry.
4. In the performance of any contracts for the construction of the Development, and prior to completion of such contracts, not to discriminate in hiring or employment on grounds of race, color, creed, national origin, ancestry, sex or sexual orientation or on grounds of any other classifications protected by state or federal law, or to discriminate on such grounds in the selection or retention of subcontractors, or in the procurement of materials or services or rentals of equipment.

Agreed to by: _____

Name of Contractor

Signature

Date

Name (type or print)

Title

PROJECT REPORTING AND MONITORING PROCEDURES

In this section of the Affirmative Action Plan, the Company must include a commitment to submit quarterly work hour reports using standard form 257 on the next page or similar equivalent form to report on the participation of minority and female trade workers for itself and for all subcontractors who work on the project. **THIS FORM MUST BE SUBMITTED QUARTERLY** from initial closing until substantial completion. Failure to submit reports may result in withholding of retainage.

Connecticut Housing Finance Authority 999 West Street Rocky Hill, CT 06067	Project Name: CHFA Project Number:	QUARTERLY EMPLOYMENT UTILIZATION REPORT (Form cc-257)	1. Project AA Goals minority male _____ female _____	2. Reporting Period from: _____ to: _____
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4. WORK HOURS OF TRADE WORKERS EMPLOYMENT ON PROJECT																	
3. Company Name and Trade	Worker Classification	4a. total hours by all employees		4b. Total hours by Black workers		4c. Total hours by Hispanic workers		4d. Total hours by Asian or Pacific Islanders workers		4e. Total hours by American Indian or Alaskan Native workers		5. Minority male percentage	6. Female percentage	7. Total number of all employees		8. Total number of minority employees	
		male	female	male	female	male	female	male	female	male	female			male	female	male	female
	Journey worker apprentice trainee																
	subtotal																
	Journey worker apprentice trainee																
	subtotal																
	Journey worker apprentice trainee																
	subtotal																
	Journey worker apprentice trainee																
	subtotal																
Total Journey Worker Hours																	
Total Apprentice Hours																	
Total Trainee Hours																	
Total of all Hours																	

9. Company Official's Signature and Title	10. Telephone Number	11. Date Signed	page ____ of ____
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INSTRUCTIONS FOR FILING EMPLOYMENT UTILIZATION REPORT (CC-257)

The Employment Utilization Report is to be completed by each subject contractor (both prime and subcontractors) and signed by a responsible official of the company. The reports are to be filed on the day required, each month during the term of the contract, and they shall include the total work-hours worked for each employee level in each designated trade for the entire reporting period. The prime contractor shall submit a report for its aggregate work force and shall collect and submit reports for each subcontractor's aggregate work force to the Federal Compliance Agency that is funding their construction project.

Reporting Period.....	Self-explanatory
Compliance Agency.....	U.S. Government Contracting or administering agency responsible for equal employment opportunity on the project.
Contractor.....	Any contractor who has a construction contract with the U.S. Government or applicant (See OFCCP Regs. 60-13).
1. Company's Name.....	Any contractor or subcontractor who has a federally involved contract.
2. Trade.....	Only those crafts covered under applicable Federal EEO bid conditions.
3. Work-hours of Employment.....	The total number of hours worked by all employees in each classification; the total number of hours worked by each *minority group in each classification and the total work-hours for all women.
Classification.....	The level of accomplishment or Status of the worker in the trade. (Journey worker, apprentice, and trainee)
4. Percent of minority work-hours of total work-hours.....	The percentage of total minority work-hours worked of all work-hours worked. (The sum of columns b, c, d, and e divided by column a.)
5. Total number of minority employees.....	Number of minority employees working in contractor's aggregate work force during reporting period.
6. Total number of employees.....	Number of all employees working in contractor's aggregate work force during reporting period.

* Minority is defined as including Blacks, Hispanics, American Indians, and Asian and Pacific Islander - both men and women.

CONCLUDING STATEMENT

I have read and pledge my full support to this Affirmative Action Plan. The Plan, and the commitments therein, are true and correct to the best of my knowledge and I pledge a “good faith effort” to achieve the objectives of the Plan within the established time frames.

Date

Chief Executive Officer

Date

Affirmative Action Officer